

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

IN RE: ROSHELL CAMPBELL

CHAPTER 13

DEBTORS

CASE NO. 17-12187-JDW

RESPONSE TO TRUSTEE'S MOTION TO DISMISS [DOCUMENT NO. 46]

COME NOW, Roshell Campbell, by and through her attorney of record and in response to the Trustee's Motion To Dismiss and would show as follows:

Undersigned counsel has been unable to reach the Debtor, and would request her case not be dismissed. Should any arrearage remain at the time of a hearing on this matter, Debtor requests it be added back into her plan.

WHEREFORE, PREMISES CONSIDERED, Debtors pray, upon a hearing hereon, this Court deny Trustee's Motion To Dismiss. Debtor prays also for such other relief, general or specific, to which they may be entitled.

RESPECTFULLY SUBMITTED,

/s/ Karen B. Schneller
ROBERT H LOMENICK, JR. MSB #104186
KAREN B. SCHNELLER, MSB #6558
ATTORNEYS AT LAW
POST OFFICE BOX 417
HOLLY SPRINGS, MISSISSIPPI 38635
(662) 252-3224

CERTIFICATE OF SERVICE

I, Robert H Lomenick, Jr, Attorney for Debtor, do hereby certify that I have this day forwarded, a true and correct copy of the above and foregoing Response To Motion To Dismiss to the Debtor, either by electronic means or by United States Mail to the following:

**Locke Barkley
Chapter 13 Trustee
P.O. Box 55829
Jackson, Mississippi 39296**

**Office of U.S. Trustee
501 East Court Street, Suite 6-430
Jackson, Mississippi 39201**

This the 15th day of October, 2018.0

/s/ Robert H Lomenick

KAREN B. SCHNELLER

ROBERT H LOMENICK